

SEALED

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2015 FEB 18 PM 12:15

ALLEN U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

§

CRIMINAL NO BY CS

§

Plaintiff,

§

I N D I C T M E N T

v.

§

[In violation of:

DAVID ODELL,

§

18 U.S.C. § 2252A(a)(2)

§

Distribution of Child Pornography;

Defendant.

§

18 U.S.C. § 2252A(a)(5)(B)

§

Possession of Child Pornography

§

SA 15 CR 0100

DAE

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 2252A(a)(2)]

On or about July 21, 2014, within the Western District of Texas, and elsewhere, the
Defendant,

DAVID ODELL,

did knowingly distribute any child pornography, as defined in Title 18, United States Code,
Section 2256(8)(A), that has been shipped or transported using any means or facility of interstate
and foreign commerce,

All in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT TWO

[18 U.S.C. § 2252A(a)(5)(B)]

On or about October 9, 2014, within the Western District of Texas, the Defendant,

DAVID ODELL,

did knowingly possess material, specifically an HP m8000 Desktop computer, bearing serial
number MXX8190JFP, which contains an image of child pornography, as defined in Title 18,
United States Code, Section 2256(8)(A), which involved a prepubescent minor, which had been

shipped and transported using any means and facility of interstate and foreign commerce, and was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer,

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT THREE

[18 U.S.C. § 2252A(a)(5)(B)]

On or about October 9, 2014, within the Western District of Texas, the Defendant,

DAVID ODELL,

did knowingly possess material, specifically a Dell XPS Laptop Computer, bearing serial number 1HL4RQ1, which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which involved a prepubescent minor, which had been shipped and transported using any means and facility of interstate and foreign commerce, and was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer,

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE COUNT

Pursuant to Federal Rule of Criminal Procedure 32.2 and Title 18 United States Code, Section 2253(a), as a result of the foregoing criminal violations set forth in the Indictment, specifically Title 18, United States Code Sections 2252A(a)(2), and 2252(a)(5)(B), the defendant DAVID ODELL shall forfeit to the United States any and all right, title and interest in any and all matter which contains visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations; and any and all

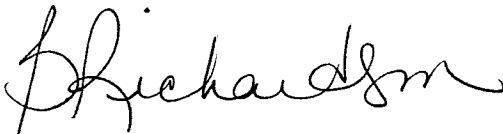
property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including, but not limited to, one (1) Dell XPS Laptop Computer with two (2) hard drives installed, and one (1) HP m8000 Desktop Computer with two (2) hard drives installed.

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

RICHARD DURBIN, JR.
ACTING UNITED STATES ATTORNEY

BY:



BETTINA J. RICHARDSON
Assistant United States Attorney